

### **REMARKS/ARGUMENTS**

The office action of April 25, 2006 has been carefully reviewed and these remarks are responsive thereto. Reconsideration and allowance of the instant application are respectfully requested. Claims 1-63 remain in this application.

Claims 1-9 [and 18] stand rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the enablement requirement. Applicants respectfully traverse this rejection.

Preliminarily, applicants wish to thank the Examiner for the courtesies extended to the undersigned during the telephonic interview of September 18, 2006, where the section 112 rejection of claim 1 was discussed. The following remarks include Applicants' substance of interview pursuant to MPEP § 713.04.

The action alleges, on page 2, that the specification does not describe the "storing the modified user profile data back to the PSD without explicit action from a user" as recited in claim 1<sup>1</sup> such that one skilled in the art could make and use the invention. On the contrary and as discussed during the interview, paragraph [15] states that "[i]f the information is modified, it is stored back to the PSD without any user interaction." Additional support for this feature can be found in paragraph [66] which recites:

the synchronization manager 316 continues to monitor the user profile data on computing device 302. Anytime a change is made to the user profile data, that change is automatically replicated on the user profile stored on PSD 300 without any user interaction.

Also, paragraph [40] provides an example in which a change to the desktop background as user profile data is made by the user, and the system detects the change and automatically replicates (stores) the change on a memory stick (i.e. portable storage device). In view of the above and as agreed by the Examiner, the specification clearly and concisely describes "storing the modified user profile data back to the PSD without explicit action from a user" as recited in claim 1.

The action also contends that the recitation "wherein the user profile data is removed from the computing device when the PSD is disconnected from the computer device" in claims 9

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<sup>1</sup> Applicants note that this feature is also recited in independent claims 10 and 19.

and 18 is not described in the specification. Applicants have amended claims 9 and 18 to clarify that the user profile data is accessible to the computing device when the PSD is connected to the computing device. Support for this amendment can be found in at least paragraph [68] and step 905 of Fig. 9.

Claims 1, 2, 4-8, 10, 11 and 13-17 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. publication 2004-0268148 to Karjala et al. ("Karjala"). Claims 3 and 12 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Karjala in view of Applicants' admitted prior art (hereafter "AAPA"). Applicants respectfully traverse these rejections.

The action alleges that Karjala discloses all the features of claims 1 and 10. Claims 1 and 10 each call for, among other features, upon detecting a connection of a Portable Storage Device (PSD) to a computing device, reading user profile data from the PSD, using the user profile data to configure the computing device, and detecting changes to the user profile data and storing the modified user profile data back to the PSD without explicit action from a user.

To show reading user profile data from the portable storage device, the action points to the mobile device 10 validating an SSM server certificate as described in paragraph [0029] of Karjala. However, an SSM server certificate in no way teaches or suggests user profile data as claimed. Indeed, user profile data relates to files and settings that are associated with a user, such as data files, application settings or user environment settings as discussed in paragraphs [44]-[46] of applicants' specification. Moreover, validating an SSM server certificate is not reading data from a portable storage device, but instead is the mobile phone reading data from a server.

To show using the user profile data to configure the computing device, the action points to using a client certificate to authenticate responses to requests as described in paragraph [0026] of Karjala. The client certificate does not correspond to user profile data just like the server certificate, and inconsistently, the action uses different certificates to show the user profile data as claimed. In any event, the client certificate is not used in to "configure the computing device" as claimed; authentication is not configuring.

To show the feature of detecting changes to the user profile data and storing the modified user profile data back to the portable storage device without explicit action from the user, the

action points to the fact that the mobile device 10 is synchronized with SSM server 20 as described in paragraph [0026] of Karjala. As discussed above the client and server certificate are not user profile data. Even assuming, but not admitting, that they were, Karjala is wholly devoid of any teaching or suggestion that the certificates are changed or modified. Karjala merely describes the local content storage of the mobile phone being synchronized with the content of the SSM server.

For the foregoing reasons, claims 1 and 10 are patentably distinct from Karjala. The allegedly admitted prior art fails to remedy the deficiencies noted with respect to Karjala. Accordingly, claims 1 and 10 and their respective dependent claims, 2-9 and 11-18, are patentably distinguishable from the applied art for at least the reasons set forth above, and further in view of the additional advantageous features recited therein.

Although not specifically rejected in the Office Action, the Action further states that claims 19-63 could be rejected upon the same basis as the above claim rejections.

Claims 19-27 are similar to claims 1-9 in many of the respects discussed above and are patentably distinct from the applied art for at least the reasons set forth above.

Applicants are concurrently submitting a Declaration under 37 CFR § 1.131 establishing a reduction to practice for claims 28-63 prior to June 30, 2003, the filing date of Karjala, to remove Karjala as a reference. Therefore, the rejection of claims 28-63 based on Karjala is no longer applicable for at least this reason.

**CONCLUSION**

If any fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

All rejections having been addressed, applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicit prompt notification of the same.

Respectfully submitted,

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